

**STATEMENT OF BASIS (AI No. 146711)
PER20060001**

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0122491** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Gulf Fish, Inc.
5885 Highway 311
Houma, LA 70360

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: December 12, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits -
LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: November 3, 2006
additional information received December 12, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - shrimp sorting, peeling, and packing

According to the November 3, 2006 application, shrimp are processed all year. Shrimp are sorted to segregate sizes, washed to remove solids, and then peeled by Laithram peeling equipment. After further cleaning, the shrimp are weighed out by 5 pound increments and packed with a 20 ounce mixture of water and sodium tripolyphosphate (STP). Sanitary wastewater is routed to the local POTW. Solid waste is disposed of at Ashland landfill.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II, fee points reduced to 0, as per administrative decision regarding seafood processors
3. Wastewater Type: II
4. SIC code: 2092 - Prepared Fresh or Frozen Fish and Seafoods

C. LOCATION - 5885 Highway 311, in Houma, Terrebonne Parish
Latitude 29° 35' 7", Longitude 90° 43' 43"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: seafood processing wastewater
Treatment: screening
Location: at the point of discharge from the effluent pipe across LA Highway 311 from
the facility
(Latitude 29° 35' 8", Longitude 90° 43' 46")
Flow: 40,800 gpd (average)
Discharge Route: Little Bayou Black; thence into Bayou Black

4. RECEIVING WATERS

STREAM - Little Bayou Black; thence into Bayou Black

BASIN AND SEGMENT - Terrebonne Basin, Segment 120202

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply*

*Applies to Bayou Black – Intracoastal Waterway to Houma, not to
tributaries or distributaries per LAC 33:IX.1111.D

5. TMDL STATUS

Subsegment 120202, Bayou Black - Intracoastal Waterway to Houma, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, page 4

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD – There are no open, appealed, or pending OEC enforcement actions as of December 12, 2006.
2. DMR Review/Excursions – There are no DMR's for this facility, as this is the initial issuance of an LPDES permit.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120202 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ).

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Gulf Fish, Inc.

1. **Outfall 001** - seafood processing wastewater (estimated flow is 40,800 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (lbs/day – unless stated)	<u>Reference</u>
Flow – (GPD)	Report: Report	LAC 33:IX.2707.I.1.b.
BOD ₅	425: 1071	40 CFR 408.125
TSS	170: 425	40 CFR 408.125
Oil and Grease	27.2: 68	40 CFR 408.125
pH	6.0: 9.0	40 CFR 408.125
(standard units)	(min.): (max.)	

Treatment: screening

Monitoring Frequency: 1/month for all parameters

Limits Justification:

Calculation of Limits for Shrimp Processing Wastewater

- 40 CFR 408, Subpart L – Southern Non-Breaded Shrimp Processing in the Contiguous States Subcategory (408.125), New Source Performance Standards apply to this facility which began operations in 2002.
- calculations based on the application production figure of 17,000 lbs. raw material/day
- 40 CFR 408.121 (c) states that the term *seafood* shall mean the raw material, including freshwater and saltwater fish and shellfish, to be processed, in the form in which it is received at the processing plant.

BOD₅: Monthly Average = $25 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs./day} = 425 \text{ lbs/day}$
 Daily Maximum = $63 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs/day} = 1071 \text{ lbs/day}$

TSS: Monthly Average = $10 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs/day} = 170 \text{ lbs/day}$
 Daily Maximum = $25 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs/day} = 425 \text{ lbs/day}$

Oil &
 Grease: Monthly Average = $1.6 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs/day} = 27.2 \text{ lbs/day}$
 Daily Maximum = $4.0 \text{ lbs}/1000 \text{ lbs} \times 17,000 \text{ lbs/day} = 68.0 \text{ lbs/day}$

Flow - Reporting of volume of effluent from each outfall is required by LAC 33:IX.2707.I.1.b.

GPD – Gallons Per Day

BPJ – Best Professional Judgement

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).